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July 15, 2020

Hon. Valerie E. Caproni  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *MSP Recovery Claims, Series LLC v. AIG Property Casualty Company*,  
Case No. 1:20-cv-02102-VEC (S.D.N.Y.)**

Dear Judge Caproni:

We represent defendant AIG Property Casualty Company (“AIGPCC”) in the above-referenced matter. Pursuant to Rules 2(C) and 3(A) of your Honor’s Individual Rules of Practice, we respectfully write on behalf of all parties to jointly request a brief adjournment of the Initial Pretrial Conference currently scheduled for July 24, 2020 to August 14, 2020, with an accompanying adjournment of the deadline to submit revised pre-conference submissions from July 16, 2020 to August 6, 2020. This is the parties’ second request for an adjournment of the Initial Pretrial Conference.

Plaintiff MSP Recovery Claims, Series LLC (“Plaintiff”) filed its Complaint in this action on March 10, 2020. On April 2, 2020, the Court issued a Notice of Initial Pretrial Conference setting the Initial Pretrial Conference for June 26, 2020 (ECF No. 6). On April 7, 2020, the Court granted AIGPCC’s first request for an extension of time to answer, move against or otherwise respond to the Complaint to June 25, 2020 (ECF No. 13). On June 18, 2020, the parties submitted the joint letter and Civil Case Management Plan and Scheduling Order required by the Court’s Notice of Initial Pretrial Conference (ECF No. 14). On June 23, 2020, the parties’ jointly requested a brief adjournment of the Initial Pretrial Conference (from June 26, 2020 to July 24, 2020) (ECF No. 15), which this Court granted later that same day (ECF No. 16). On June 25, 2020, AIGPC filed (i) a Motion to Dismiss Plaintiff’s Complaint and supporting Memorandum of Law (ECF Nos. 19-20); (ii) a Motion to Strike Class Allegations and supporting Memorandum of Law (ECF Nos. 22-23); and (iii) a Motion for Costs and for a Stay Pending Payment of Costs Pursuant to Fed. R. Civ. P. 41(d) and supporting Memorandum of Law (ECF Nos. 24 and 25) (collectively, the “Motions”). Upon the parties’ agreement, the Court extended the deadlines for Plaintiff to file oppositions to the Motions (to August 4, 2020) (ECF No. 29) and for AIGPCC to file reply briefs in further support of the Motions (to September 15, 2020) (ECF No. 31).

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The parties respectfully request this brief three-week adjournment of the Initial Pretrial Conference in order to permit the parties additional time to confer regarding the case schedule and a potential agreement to jointly request a stay of discovery pending resolution of AIGPCC's Motions (and any motions to dismiss any amended complaints filed by Plaintiff) in exchange for an agreement by AIGPCC to promptly commence data matching discovery proposed by Plaintiff if the Motions (and any motions to dismiss any amended complaints filed by Plaintiff) are denied, as discussed in the parties' June 18, 2020 joint letter and Civil Case Management Plan and Scheduling Order (ECF 14 at 3). Since the parties' first request for an adjournment of the Initial Pretrial Conference, AIGPCC has been evaluating Plaintiff's data matching discovery proposal, but the parties need additional time to, among other things, allow AIGPCC to gather information in order to assess the feasibility and resources required to provide certain data requested by Plaintiff and allow the parties to potentially arrange discussions with their respective data specialists in an effort to reach an agreement on Plaintiff's proposal.

This is the parties' second request for an adjournment of the Initial Pretrial Conference and all parties are available on the requested date. Accordingly, the parties jointly request that the July 24, 2020 Initial Pretrial Conference be adjourned to August 14, 2020, with an accompanying adjournment of the deadline to submit revised pre-conference submissions from July 16, 2020 to August 6, 2020.

Should your Honor require any additional information, please feel free to contact me. We appreciate your consideration in this matter.

Respectfully Submitted,

/s/ Suzanne Jaffe Bloom  
Suzanne Jaffe Bloom

cc: All Counsel of Record (via ECF)

Application GRANTED. The July 24 initial conference is adjourned to **August 14, 2020, at 2:00 P.M.** The dial-in information remains the same: 1-888-363-4749, access code 3121171#, and security code 2102.

SO ORDERED.

Date: 07/15/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE